

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

CONGHUA YAN,

Plaintiff,

v.

The State Bar of Texas et al,

Defendants.

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) Case No. [4:23-cv-00758-P-BJ]
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**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE
AND BRIEF IN SUPPORT**

COMES NOW, Plaintiff, Conghua Yan, and respectfully moves this Honorable Court for a Motion for Extension of Time to file response to MOTION to Dismiss, ECF No. 90. The Plaintiff requests that this Honorable Court consider and grant this Motion for Extension of Time, pursuant to Rule 6, Fed. R. Civ. P..

No previous extension has been requested, and Plaintiff does not foresee any need for further extension(s). In support of this motion, Plaintiff states as follows:

I. INTRODUCTION/ BACKGROUND/Brief in Support

1. On September 18th, 2023, the Plaintiff filed a complaint against The State Bar of Texas et al, defendants. ECF No. 60,
2. On October 9, 2023, Defendant Leslie Barrows and Barrows Firm filed a Motion to Dismiss against the Plaintiff, ECF No. 90.
3. Plaintiff has not pursued any Pro-Se suits prior to 2023.
4. Plaintiff is a full-time employee who needs to work during the weekdays.

5. Plaintiff is facing 11 opposing parties in this case. While Plaintiff is representing himself as a Pro-Se litigant, each of the 11 opposing parties is either an attorney or is represented by one.
6. Plaintiff is not a native English speaker.
7. Plaintiff does not possess a law degree or any higher education degree from the US.
8. Considering the plaintiff's language background, lack of experience, and absence of formal US education, it is reasonable to expect that Plaintiff would need more time to respond. Furthermore, dealing with 11 parties in a short timeframe exacerbates the situation.

IV. Prayer for Relief

9. Based on the foregoing, Plaintiff prays for the following relief:
 - A. The plaintiff seeks the court to grant this unopposed motion for a 21 days extension of time to file Response, making Plaintiff's Response due after 42 days.

Respectfully submitted,

/s/ Conghua Yan
Conghua Yan, Pro Se Plaintiff
[Conghua Yan] [2140 E Southlake Blvd, Suite L-439] [Southlake, Texas 76092] [214-228-1886]
/[arnold200@gmail.com]

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Plaintiff,)	
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v.)	Case No. [4:23-CV-00758]
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CERTIFICATE OF CONFERENCE

On October 12th, 2023, Plaintiff consulted with Ms. Caroline Cyrier and Mr. Roland Johnson, the attorneys for the Defendant. After the consultation, pertaining to the UNOPPOSED MOTION FOR EXTEND OF TIME for the Response to ECF No. 90, both parties agreed to an extension of the response timeline from 21 days to 42 days.

Opposing counsels have expressed their opinion to,

- ☐ Opposed the Motion.
☒ Unopposed Motion.

/s/ Conghua Yan
Conghua Yan, Pro Se Plaintiff
[Conghua Yan] [2140 E Southlake Blvd, Suite L-439] [Southlake, Texas 76092] [214-228-1886]
[arnold200@gmail.com]

**The Certificate of Conference may be filed as a separate pleading with the style and number of the case set out at the top. If the Certificate of Conference is placed within the Motion it accompanies, the Conference should be set out in a separate paragraph and clearly labeled*

CERTIFICATE OF
SERVICE

On (October 23th, 2023) I, Conghua Yan, filed hereby certify that I have served the forgoing document on all counsels and/or pro se parties of record in a manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Conghua Yan

Conghua Yan, Pro Se Plaintiff

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